

April 22, 2009

VIA ECFS

EX PARTE

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

**Re: *Petition of Verizon New England for Forbearance Pursuant to
47 U.S.C. § 160(c) in Rhode Island, WC Dkt. No. 08-24; Petition of the Verizon
Telephone Companies for Forbearance Pursuant to 47 U.S.C. § 160(c) in Cox's
Service Territory in the Virginia Beach Metropolitan Statistical Area,
WC Dkt. No. 08-49***

Dear Ms. Dortch:

The undersigned parties, by their counsel, hereby submit the attached study prepared by QSI Consulting, Inc., entitled *An Analysis of Verizon's Petitions for Forbearance: A Quantification of the Impact of Forbearance* (the "*QSI Study*"), in the above-referenced dockets. The *QSI Study* focuses on the direct and quantifiable impact of granting Verizon's pending forbearance petitions. Specifically, the *QSI Study* concludes that if the Commission grants the petitions, "the annual impact in terms of increased telecommunications expenses incurred by customers for retail mass market and enterprise voice and Internet services, as well as residential video would be approximately \$210 million *annually*, including \$73 million associated with the Rhode Island Petition, and \$138 million associated with the Virginia Beach Petition." *QSI Study* at 5 (emphasis in original). Accordingly, granting Verizon's pending forbearance petitions is not in the public interest and both petitions should be denied.

Please do not hesitate to contact the undersigned if you have any questions or concerns about this submission.

Respectfully submitted,

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